

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
_____)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

Suits Naming the Tennessee Clinic)
Defendants)
_____)

NOTICE OF SERVICE OF DISCOVERY

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively “Tennessee Clinic Defendants”) give notice to the Court and to all parties that they have served written discovery on the following parties:

- Barry Cadden
- Glenn Chin
- Douglas Conigliaro
- Gregory Conigliaro
- Carla Conigliaro
- Lisa Conigliaro Cadden.

The Tennessee Clinic Defendants attach as a collective exhibit to this Notice this written discovery so as to ensure that all parties in the MDL are served with a copy. In order to most efficiently serve this discovery, paper copies (or email copies, where counsel agreed to accept service by email) have been served on the recipients of the

discovery and all other parties are hereby served electronically with the discovery via ECF service of this Notice and its attachment.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

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* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 31th day of March, 2015.

/s/ Chris J. Tardio

Chris J. Tardio